

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	)	
	)	
Akilah D. Wallace,	)	Case No. 18-24519 GLT
Debtor(s)	)	Chapter 13
	)	Related Docket No.
	)	
	)	
Akilah D. Wallace,	)	
Movant(s)	)	
	)	
vs.	)	
	)	
Community Loan Servicing, LLC,	)	
Respondent(s)	)	

**OBJECTION TO NOTICE OF MORTGAGE PAYMENT CHANGE**  
**RE: CLAIM 7**

AND NOW, comes the Debtor, Akilah D. Wallace, by and through her attorney Christopher M. Frye, and Steidl and Steinberg, Attorneys at Law, and respectfully represents as follows:

1. This case was commenced on January 7, 2020 when the Debtor filed a voluntary petition under Chapter 13 of the Bankruptcy Code.
2. Akilah D. Wallace is the Debtor in the above-captioned proceeding and is the Movant in this motion.
3. The Respondent filed a Notice of Mortgage Payment Change on March 10, 2021.
4. The Respondent avers that the Debtor's monthly escrow payment will need to increase from \$288.73 to \$317.83, effective April 1, 2021.

5. The Respondent avers that the reason for the increase is that the Debtor's account has a shortage of \$453.12.
6. Based on the Respondent's escrow analysis, the escrow items to be paid in 2021 decreased.
7. The Debtor avers that the projected escrow shortage of \$862.98 from the Respondent's proof of claim, claim 7, filed on January 29, 2019 has not been credited.
8. The Debtor is requesting that the Respondent's Notice of Mortgage Payment be denied.

WHEREFORE, the Debtor, Akilah D. Wallace, respectfully requests this Honorable Court to grant her objection to the Respondent's Notice of Mortgage Payment Change.

Respectfully submitted,

March 31, 2021  
DATE

/s/ Christopher M. Frye  
Christopher M. Frye, Esquire  
Attorney for the Debtors

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